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17 Attorneys for The Roman Catholic Archbishop of
San Francisco

18 UNITED STATES BANKRUPTCY COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 In re
22 THE ROMAN CATHOLIC ARCHBISHOP
23 OF SAN FRANCISCO,

24 Debtor and
Debtor in Possession.

Case No. 23-30564

Chapter 11

**NOTICE OF FULLY EXECUTED
STIPULATION BY AND AMONG THE
ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO, THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS, AND THE SURVIVOR
DEFENDANTS**

Date: September 4, 2025
Time: 1:30 p.m.
Location: via Zoom
Judge: Hon. Dennis Montali

NOTICE IS HEREBY GIVEN that the Roman Catholic Archbishop of San Francisco, the debtor and debtor in possession (“Debtor” or “RCASF”), in the above-captioned chapter 11 case (the “Bankruptcy Case” or “Main Case”), hereby files the attached fully executed *Stipulation by and Among the Roman Catholic Archbishop of San Francisco, the Official Committee Of Unsecured Creditors, and the Survivor Defendants*.

Dated: September 15, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

By: /s/ Paul J. Pascuzzi
Paul J. Pascuzzi
Attorneys for The Roman Catholic Archbishop of
San Francisco

Dated: September 15, 2025

SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP

By: /s/ Ori Katz
Ori Katz
Attorneys for The Roman Catholic Archbishop of
San Francisco

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Attorneys for The Roman Catholic Archbishop of
San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
The Roman Catholic Archbishop of San
Francisco,

Debtor and
Debtor in Possession.

Case No. 23-30564
Chapter 11
Adv No. 25-03019

**STIPULATION BY AND AMONG
THE ROMAN CATHOLIC
ARCHBISHOP OF SAN
FRANCISCO, THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS, AND THE SURVIVOR
DEFENDANTS**

The Roman Catholic Archbishop of San
Francisco,

Plaintiff,

v.

Judge: Hon. Dennis Montali
Date: July 17, 2025
Time: 1:30 p.m.
Place: Zoom.Gov

1 John DB Roe SF, John Doe H.M, C.M.,
John Doe SF 1218, Jane Doe SF 2017,
2 John Roe 521, John Roe 663, John Doe
664, LL John Doe WC, John Doe SF
3 2028, John Doe SF 1510, John Doe, John
Roe 644, Jane Roe, G.J., M.R.H., John
4 Doe SF 1426, John Doe L.M., John Roe
457, John Doe A.D.R., John Doe A.L.R.,
5 John Roe 417, John Roe 499, G.W.,
Joseph Doe OAK 475, John Doe MR
6 1236, Jane Doe 7, John PV Roe 554, John
Doe F.O., John Doe CLG03522, John Doe
7 SF 1913, Jane Doe SF 1260, John Doe SF
1026, John Doe SF 1196, Jane Doe SF
8 1200, John Doe SF 1201, Jane Doe SF
1233, Joseph Doe SF 601, and Jane Doe
9 116,
Defendants,

10
11 The Roman Catholic Archbishop of San Francisco (the “Debtor”), the Official Committee
12 of Unsecured Creditors (the “Committee”), each of the defendants in the above-captioned adversary
13 proceeding that have not previously agreed to stay their cases (the “Survivor Defendants”), and the
14 plaintiffs in the Released State Court Actions (defined below) (the “Plaintiffs”; collectively the
15 Debtor, the Committee, the Survivor Defendants, and the Plaintiffs are the “Parties” and each is a
16 “Party”), stipulate and agree as follows:

17 RECITALS

18 A. The Debtor filed a voluntary petition with this Court under chapter 11 of the
19 Bankruptcy Code on August 21, 2023 (the “Petition Date”), which chapter 11 case No. 23-30564
20 (the “Bankruptcy Case”) is pending before the Bankruptcy Court for the Northern District of
21 California (the “Bankruptcy Court”).

22 B. The Office of the United States Trustee appointed the Committee on September 1,
23 2023, pursuant to 11 U.S.C. § 1102.

24 C. In October 2019, Governor Gavin Newsom signed AB 218, known as the California
25 Child Victims Act (the “CVA”), which expanded legal protections for survivors of child sexual
26 abuse (“Survivors”). The CVA went into effect on January 1, 2020, opening a three-year “revival
27 window” during which any Survivor could file civil claims regardless of when the abuse occurred.

1 D. During the CVA's revival window, approximately 541 Survivors filed civil actions
2 against the Debtor, virtually all of which have been consolidated (along with other Northern
3 California clergy cases naming other defendants) into a coordinated proceeding entitled *In re*
4 *Northern California Clergy Cases*, JCCP No. 5108 in the Superior Court of California, County of
5 Alameda (the "State Court").

6 E. Thirty-nine of those actions include as named defendants at least one of the non-
7 Debtor affiliates listed on ***Exhibit A*** (the "Non-Debtor Affiliates"). These actions are identified in
8 ***Exhibit B*** (collectively, the "Affiliate State Court Actions").

9 F. On April 28, 2025, the Debtor initiated the above-captioned adversary proceeding by
10 filing a complaint for declaratory and injunctive relief that would prevent all the Affiliate State Court
11 Actions from proceeding for the duration of the Debtor's Bankruptcy Case.

12 G. On May 29, 2025, the Debtor and the Committee stipulated that the Committee is
13 permitted to appear, be heard, and intervene, which was approved by the Court [Adv. Pro. ECF Nos.
14 7, 11].

15 H. On May 29, 2025, the Debtor filed a *Motion for Order Extending Stay to All State*
16 *Court Cases in Which Debtor and/or Non-Debtor Affiliates Are Named as Defendants Under*
17 *Bankruptcy Code Sections 105(a) and 362* along with supporting declarations and exhibits [Adv.
18 Pro. ECF No. 8] (the "Injunction Motion"), seeking both a declaration that the automatic stay
19 extends to all Affiliate State Court Actions and, in the alternative, an injunction that would prevent
20 all Affiliate State Court Actions from proceeding for the duration of the Debtor's Bankruptcy Case.

21 I. On June 12, 2025, the Committee filed an *Opposition* and supporting documents to
22 the Injunction Motion [Adv. Pro. ECF Nos. 13-15].

23 J. On June 13, 2025, the Debtor and the Committee stipulated to a voluntary stay of the
24 Affiliate State Court Actions naming the High Schools as defendants, which was approved by the
25 Court [Adv. Pro. ECF Nos. 17, 19].

26 K. On June 20, 2025, the Debtor filed a *Reply* to the Injunction Motion [Adv. Pro. ECF
27 No. 18].

1 L. On June 24, 2025, the Debtor and the Committee agreed to continue the court hearing
2 on the Injunction Motion from June 26, 2025 until July 17, 2025 at 1:30 p.m.

3 ///

4 **STIPULATION**

5 1. The above recitals are incorporated by reference.

6 2. Subject to Paragraph 3, the Parties agree to a stipulated injunction pursuant to 11
7 U.S.C. § 105(a), enjoining prosecution of the Affiliate State Court Actions, including against the
8 Non-Debtor Affiliates named therein (the “Stipulated Stay Injunction”).

9 3. Attached as ***Exhibit C*** is a list identifying 5 state court actions (the “Released State
10 Court Actions”) to be released from the Stipulated Stay Injunction that shall proceed to trial, subject
11 to the following terms:

12 a. The Plaintiffs may prosecute, and any court where the action is pending may
13 proceed with all necessary actions to adjudicate, the Released State Court Actions through final
14 judgment, including against the Debtor and all non-Debtor defendants.

15 b. The Debtor is authorized to pay reasonable defense fees and costs in the
16 Released State Court Actions that are not paid by an insurer, notwithstanding any prior order of the
17 Court.

18 c. Entry of a judgment against any defendant in the Released State Court
19 Actions shall not create a lien against any non-insurance asset of the Debtor or any Non-Debtor
20 Affiliate. Nothing in this Stipulation should be construed to prevent a lien from attaching to the
21 Debtor’s and/or any Non-Debtor Affiliate’s insurance policies or the proceeds of such policies, or
22 the assets of any defendant that is not the Debtor or a Non-Debtor Affiliate or the enforcement of
23 such lien.

24 d. No Plaintiff may create or take any action to effectuate the creation or
25 imposition of any lien against any non-insurance asset(s) of the Debtor or any Non-Debtor Affiliate.
26 Further, no Survivor may collect, levy, execute, or otherwise enforce any judgment against any non-
27 insurance asset(s) of the Debtor or any Non-Debtor Affiliate.

1 4. The Parties agree that all Survivors (regardless of whether their claims are selected
2 as Released State Court Actions) may make written settlement demands on the Debtor and any non-
3 Debtor defendant(s) and request that the Debtor and any non-Debtor defendant(s) tender those
4 demands on their respective insurers and request that the insurers pay those demands. The Parties
5 further agree that such demands are not a violation of the Stipulated Stay Injunction or the stay
6 imposed by 11 U.S.C. § 362(a).

7 5. Except as provided in Paragraphs 3, nothing in this Stipulation provides for the
8 modification or vacatur of the automatic stay imposed by 11 U.S.C. § 362(a).

9 6. Nothing in this Stipulation is an admission by any Party as to the allegations in the
10 Injunction Motion or any opposition or reply filed thereto, or the merits of any of the issues raised
11 therein.

12 7. Any Party may request that the Bankruptcy Court modify or rescind the Stipulated
13 Stay Injunction, except that the Released State Court Actions shall not be stayed or otherwise
14 enjoined without the consent of the Committee and the applicable Plaintiff/Survivor, or by the Court
15 upon a showing of extraordinary circumstances. The requesting party must give the Debtor and the
16 Committee at least three (3) days' written notice prior to filing the request and may not set the matter
17 for hearing on less than 30 days' notice from the time of filing. In connection with such a request,
18 nothing in this Stipulation modifies the Parties' respective burdens of proof that they bore in relation
19 to the Injunction Motion.

20 8. The Parties request that the Court approve this Stipulation and enter the proposed
21 order attached hereto as ***Exhibit 1.***

22
23 Dated: July __, 2025

**FELDERSTEIN FITZGERALD
WILLOUGHBY PASCUZZI & RIOS LLP**

24
25 By /s/ Paul J. Pascuzzi
26 Paul J. Pascuzzi
27 Attorney for Debtor and Debtor in Possession
The Roman Catholic Archbishop of San Francisco

28 Dated: July __, 2025

PACHULSKI STANG ZIEHL & JONES LLP

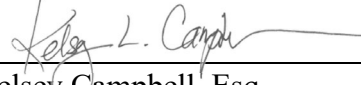
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By /s/ Brittany M Michael
James I. Stang
Brittany M. Michael
Gail S. Greenwood
*Counsel for the Official Committee of
Unsecured Creditors*

Dated: July 25, 2025

BOUCHER LLP
By 
Kelsey Campbell, Esq.
Counsel for John Doe L.M. and John Doe W.C.D.

Dated: July __, 2025

KBM LAW
By _____
Karen Barth Menzies, Esq.
Counsel for John Doe H.M.

Dated: July __, 2025

DONAHOO & ASSOCIATES, PC
By _____
Richard E. Donahoo, Esq.
Counsel for C.M., G.J., and M.R.H.

Dated: July __, 2025

HERMAN LAW
By _____
Justin Felton, Esq.
Counsel for G.W.

Dated: July __, 2025

JEFF ANDERSON & ASSOCIATES
By _____
Jennifer Stein, Esq.
*Counsel for John Doe SF 1218, Jane Doe SF 2017,
John Doe SF 1510, John Doe SF 2028, John Doe SF
1426, John Doe MR 1236, Jane Doe SF 1260, and
Jane Doe SF 1053*

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By /s/ Brittany M Michael
James I. Stang
Brittany M. Michael
Gail S. Greenwood
*Counsel for the Official Committee of
Unsecured Creditors*

Dated: July __, 2025

BOUCHER LLP

By _____
Kelsey Campbell, Esq.
Counsel for John Doe L.M. and John Doe W.C.D.

Dated: July __, 2025

KBM LAW

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Karen Barth Menzies, Esq.
Counsel for John Doe H.M.

August 6
Dated: ~~July~~ __, 2025

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By /s/ Brittany M Michael
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Brittany M. Michael
Gail S. Greenwood
*Counsel for the Official Committee of
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Dated: July __, 2025

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Counsel for John Doe H.M.

Dated: July __, 2025

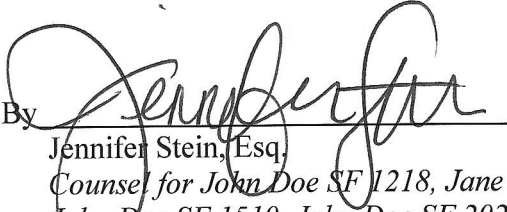
DONAHOO & ASSOCIATES, PC
By _____
Richard E. Donahoo, Esq.
Counsel for C.M., G.J., and M.R.H.

Dated: July 29, 2025


HERMAN LAW
By  _____
Justin Felton, Esq.
Counsel for G.W.

Dated: July __, 2025

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By _____
Jennifer Stein, Esq.
*Counsel for John Doe SF 1218, Jane Doe SF 2017,
John Doe SF 1510, John Doe SF 2028, John Doe SF
1426, John Doe MR 1236, Jane Doe SF 1260, and
Jane Doe SF 1053*

1 By 
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2 Counsel for John Doe SF 1218, Jane Doe SF 2017,
3 John Doe SF 1510, John Doe SF 2028, John Doe SF
4 1426, John Doe MR 1236, Jane Doe SF 1260, and
5 Jane Doe SF 1053

6
7 Dated: July 22, 2025

8 **JOSEPH C. GEORGE, JR. LAW**
9 By 
Joseph George, Jr., Esq.
10 Counsel for Joseph Doe OAK 475

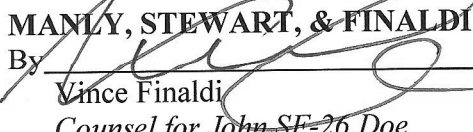
11 Dated: July __, 2025

12 **KETTERER, BROWNE & ASSOCIATES**
13 By _____
Andy LeClair, Esq.
14 Counsel for John Doe A.L.R. and A.D.R.

15 Dated: July __, 2025

16 **LIAKOS LAW, APC**
17 By _____
Jennifer Liakos, Esq.
18 Counsel for LL John Doe WC

19 Dated: July 22, 2025

20 **MANLY, STEWART, & FINALDI**
21 By 
Vince Finaldi
22 Counsel for John SF-26 Doe

23 Dated: July __, 2025

24 **REICH & BINSTOCK, LLP**
25 By _____
26 Counsel for John PV Roe 554

27 Dated: July __, 2025

28 **RIBERA LAW FIRM**
By _____
Sandra Ribera Speed, Esq.
Counsel for John Doe

Dated: July __, 2025

SLATER SLATER SCHULMAN LLP
By _____

1 Dated: July __, 2025

JOSEPH C. GEORGE, JR. LAW

2 By _____
3 Joseph George, Jr., Esq.
4 Counsel for Joseph Doe OAK 475

5 Dated: July 29, 2025

KETTERER, BROWNE & ASSOCIATES

6 By _____
7 Andy Leclair, Esq.
8 Counsel for John Doe A.L.R. and A.D.R.

8 Dated: July __, 2025

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10 Jennifer Liakos, Esq.
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14 Dated: July __, 2025

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16
17 Counsel for John PV Roe 554

18 Dated: July __, 2025

RIBERA LAW FIRM

19 By _____
20 Sandra Ribera Speed, Esq.
21 Counsel for John Doe

21 Dated: July __, 2025

SLATER SLATER SCHULMAN LLP

22 By _____
23
24 Counsel for John Roe 521, John Roe 644, John Roe
25 457, John Roe 417, John Roe 499, John Roe 663,
26 John Roe 664, Jane Roe

26 Dated: July __, 2025

THOMPSON LAW OFFICE, PC

27 By _____
28 Robert Thompson, Esq.
Counsel for John Doe A.D.R. and A.L.R.

1 Dated: July __, 2025

JOSEPH C. GEORGE, JR. LAW

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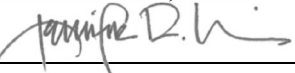
5 Dated: July __, 2025

KETTERER, BROWNE & ASSOCIATES

6 By _____
7 Andy LeClair, Esq.
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July 29, 2025

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10 Jennifer Liakos, Esq.
11 *Counsel for LL John Doe WC*

11 Dated: July __, 2025

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14 *Counsel for John SF-26 Doe*

14 Dated: July __, 2025

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16 *Counsel for John PV Roe 554*

17 Dated: July __, 2025

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19 Sandra Ribera Speed, Esq.
20 *Counsel for John Doe*

21 Dated: July __, 2025

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23 *Counsel for John Roe 521, John Roe 644, John Roe*
24 *457, John Roe 417, John Roe 499, John Roe 663,*
25 *John Roe 664, Jane Roe*

26 Dated: July __, 2025

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28 Robert Thompson, Esq.
Counsel for John Doe A.D.R. and A.L.R.

1 Dated: July __, 2025

JOSEPH C. GEORGE, JR. LAW

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3 Joseph George, Jr., Esq.
4 Counsel for Joseph Doe OAK 475

5 Dated: July __, 2025

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7 Andy LeClair, Esq.
8 Counsel for John Doe A.L.R. and A.D.R.

8 Dated: July __, 2025

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10 Jennifer Liakos, Esq.
11 Counsel for LL John Doe WC

11 Dated: July __, 2025

MANLY, STEWART, & FINALDI

12 By _____
13 Vince Finaldi
14 Counsel for John SF-26 Doe

14 Dated: July 30th, 2025

REICH & BINSTOCK, LLP

15 By _____
16 Counsel for John PV Roe 554

18 Dated: July __, 2025

RIBERA LAW FIRM

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20 Sandra Ribera Speed, Esq.
21 Counsel for John Doe

21 Dated: July __, 2025

SLATER SLATER SCHULMAN LLP

22 By _____
23 Counsel for John Roe 521, John Roe 644, John Roe
24 457, John Roe 417, John Roe 499, John Roe 663,
25 John Roe 664, Jane Roe

26 Dated: July __, 2025

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27 By _____
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1 Dated: July __, 2025

JOSEPH C. GEORGE, JR. LAW

2 By _____
3 Joseph George, Jr., Esq.
4 *Counsel for Joseph Doe OAK 475*

5 Dated: July __, 2025

KETTERER, BROWNE & ASSOCIATES

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7 Andy LeClair, Esq.
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July __, 2025

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10 Jennifer Liakos, Esq.
11 *Counsel for LL John Doe WC*

11 Dated: July __, 2025

MANLY, STEWART, & FINALDI

12 By _____
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14 *Counsel for John SF-26 Doe*

14 Dated: July __, 2025

REICH & BINSTOCK, LLP

15 By _____
16 *Counsel for John PV Roe 554*

17 Dated: July __, 2025

RIBERA LAW FIRM

18 By _____
19 Sandra Ribera Speed, Esq.
20 *Counsel for John Doe*

21 Dated: July 31, 2025

SLATER SLATER SCHULMAN LLP

22 By  _____

23 *Counsel for John Roe 521, John Roe 644, John Roe*
24 *457, John Roe 417, John Roe 499, John Roe 663,*
25 *John Roe 664, Jane Roe*

26 Dated: July __, 2025

THOMPSON LAW OFFICE, PC

27 By _____
28 Robert Thompson, Esq.
Counsel for John Doe A.D.R. and A.L.R.

1 Dated: July __, 2025

JOSEPH C. GEORGE, JR. LAW

2 By _____
3 Joseph George, Jr., Esq.
4 *Counsel for Joseph Doe OAK 475*

5 Dated: July __, 2025

KETTERER, BROWNE & ASSOCIATES

6 By _____
7 Andy LeClair, Esq.
8 *Counsel for John Doe A.L.R. and A.D.R.*

8 Dated: July __, 2025

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9 By _____
10 Jennifer Liakos, Esq.
11 *Counsel for LL John Doe WC*

11 Dated: July __, 2025

MANLY, STEWART, & FINALDI

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13 Vince Finaldi
14 *Counsel for John SF-26 Doe*

14 Dated: July __, 2025

REICH & BINSTOCK, LLP

15 By _____
16 *Counsel for John PV Roe 554*

17 Dated: July __, 2025

RIBERA LAW FIRM

18 By _____
19 Sandra Ribera Speed, Esq.
20 *Counsel for John Doe*

21 Dated: July __, 2025

SLATER SLATER SCHULMAN LLP

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23 *Counsel for John Roe 521, John Roe 644, John Roe*
24 *457, John Roe 417, John Roe 499, John Roe 663,*
25 *John Roe 664, Jane Roe*

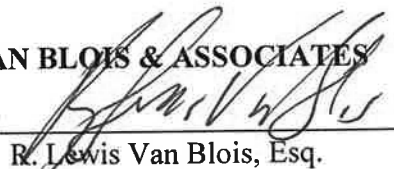
26 Dated: July 29, 2025

THOMPSON LAW OFFICE, PC

27 By Robert W. Thompson
28 Robert Thompson, Esq.
Counsel for John Doe A.D.R. and A.L.R.

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Dated: July __, 2025

VAN BLOIS & ASSOCIATES
By 
R. Lewis Van Blois, Esq.
Counsel for Jane Doe 7

Dated: July 28, 2025

THE ZALKIN LAW FIRM, P.C.
By _____
Devin Storey, Esq.
Counsel for John DB Roe SF and John MW Roe SF

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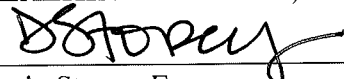
Dated: July __, 2025

VAN BLOIS & ASSOCIATES

By _____
R. Lewis Van Blois, Esq.
Counsel for Jane Doe 7

Dated: July 25, 2025

THE ZALKIN LAW FIRM, P.C.

By 
Devin Storey, Esq.
Counsel for John DB Roe SF and John MW Roe SF

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Dated: July __, 2025

VAN BLOIS & ASSOCIATES

By _____
R. Lewis Van Blois, Esq.
Counsel for Jane Doe 7

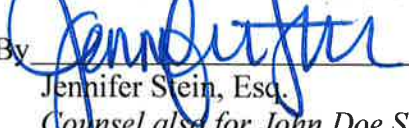
Dated: July __, 2025

THE ZALKIN LAW FIRM, P.C.

By _____
Devin Storey, Esq.
Counsel for John DB Roe SF and John MW Roe SF

Dated: August 9, 2025
September

JEFF ANDERSON & ASSOCIATES

By  _____
Jennifer Stein, Esq.
Counsel also for John Doe SF 1237, John Doe SF 1882, John Doe SF 1226, John Doe SF 1894, John Doe SF 1549, and John Doe SF 1166

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Attorneys for The Roman Catholic Archbishop of
San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
The Roman Catholic Archbishop of San
Francisco,
Debtor and
Debtor in Possession.

Case No. 23-30564
Chapter 11

The Roman Catholic Archbishop of San
Francisco,
Plaintiff,
v.

Adv No. 25-03019

**STIPULATED ORDER GRANTING
PRELIMINARY INJUNCTION AND
GRANTING RELIEF FROM STAY**

John DB Roe SF, John Doe H.M, C.M.,
John Doe SF 1218, Jane Doe SF 2017,
John Roe 521, John Roe 663, John Doe
664, LL John Doe WC, John Doe SF

Judge: Hon. Dennis Montali
Date: September 4, 2025
Time: 1:30 p.m.
Place: Zoom.Gov

2028, John Doe SF 1510, John Doe, John
Roe 644, Jane Roe, G.J., M.R.H., John
Doe SF 1426, John Doe L.M., John Roe
457, John Doe A.D.R., John Doe A.L.R.,
John Roe 417, John Roe 499, G.W.,
Joseph Doe OAK 475, John Doe MR
1236, Jane Doe 7, John PV Roe 554, John
Doe F.O., John Doe CLG03522, John Doe
SF 1913, Jane Doe SF 1260, John Doe SF
1026, John Doe SF 1196, Jane Doe SF
1200, John Doe SF 1201, Jane Doe SF
1233, Joseph Doe SF 601, and Jane Doe
116,

Defendants,

Based on the Stipulation of The Roman Catholic Archbishop of San Francisco (the
“Debtor”), the Official Committee of Unsecured Creditors (the “Committee”), and each of the
defendants in this Action (the “Survivor Defendants”; collectively the Debtor, the Committee, and
the Survivor Defendants are the “Parties”), IT IS ORDERED:

1. Pursuant to 11 U.S.C. § 105(a) and the agreed Stipulated Stay Injunction, the
Survivor Defendants are enjoined from prosecuting any of the Affiliate State Court Actions
identified on **Exhibit B** to this Order, including against any of the Non-Debtor Affiliates, listed on
Exhibit A to this Order, named therein.¹

2. The 5 state court actions, which are identified on **Exhibit C** to this Order (the
“Released State Court Actions”), are released from the Stipulated Stay Injunction and may proceed
to trial subject to the following terms:

a) The Plaintiffs may prosecute, and any court where the action is pending may proceed
with all necessary actions to adjudicate, the Released State Court Actions through
final judgment, including against the Debtor and all non-Debtor defendants.

b) The Debtor is authorized to pay defense costs in the Released State Court Actions
that are not paid by an insurer, notwithstanding any prior order of the Court.

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¹ Additional state court actions may be added to this Order by stipulation of the Debtor,
Committee and survivor claimant.

1 c) Entry of a judgment against any defendant in the Released State Court Actions shall
2 not create a lien against any non-insurance asset of the Debtor or any Non-Debtor
3 Affiliate. For the avoidance of doubt, nothing in this Stipulation should be construed
4 to prevent a lien from attaching to the Debtor's and/or any Non-Debtor Affiliate's
5 insurance policies or the proceeds of such policies, or the assets of any defendant that
6 is not the Debtor or a Non-Debtor Affiliate.

7 d) No Plaintiff may create or take any action to effectuate the creation or imposition of
8 any lien against any non-insurance asset(s) of the Debtor or any Non-Debtor
9 Affiliate. Further, no Survivor may collect, levy, execute, or otherwise enforce any
10 judgment against any non-insurance asset(s) of the Debtor or any Non-Debtor
11 Affiliate.

12 3. Nothing in this Order is an admission by any Party, or a determination or finding of
13 fact by this Court, as to the allegations in the Injunction Motion or in any oppositions filed thereto,
14 or the merits of any of the issues raised therein.

15 4. The Stipulated Stay Injunction and the automatic stay imposed by 11 U.S.C. § 362(a)
16 are further modified to allow any Survivor (regardless of whether their claims are selected as
17 Released State Court Actions) to make written settlement demands on the Debtor and any non-
18 Debtor defendant(s) and request that the Debtor and any non-Debtor defendant(s) tender those
19 demands on their respective insurers and request that the insurers pay those demands.

20 5. For the avoidance of doubt, and except as provided in Paragraphs 2 and 4, nothing
21 in this Order modifies, lifts, or vacates the automatic stay imposed by 11 U.S.C. § 362(a).

22 6. This Court shall retain jurisdiction to hear and determine all matters arising from or
23 related to the implementation, interpretation, and/or enforcement of this Order.

24 7. The Stipulated Stay Injunction is an interim order and not a final adjudication on the
25 merits of the Injunction Motion or the relief requested in the Complaint.

26 8. Any Party may request that the Bankruptcy Court modify or rescind this Order by
27 filing a motion in this case, except that the Released State Court Actions shall not be stayed or
28 otherwise enjoined without the consent of the Committee and the applicable Plaintiff/Survivor or

1 by the Court upon a showing of extraordinary circumstances. The requesting party must give the
2 Debtor and the Committee at least three (3) days' written notice prior to filing the request and may
3 not set the matter for hearing on less than 30 days' notice from the time of filing.

4 9. Any party in interest that is not a Party, may seek relief from the injunction imposed
5 by this Order, by filing a motion in the Debtor's chapter 11 case (the "Bankruptcy Case"), setting
6 forth cause sufficient to justify relief pursuant to 11 U.S.C. § 362(d).

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8 *****END OF ORDER*****
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EXHIBIT A

Exhibit A

Parishes and Missions

All Hallows Chapel
All Souls Church (All Souls School)
Assumption Church (Tomaes)
Cathedral of St. Mary of the Assumption
Church of the Epiphany (Epiphany School)
Church of the Good Shepherd (Good Shepherd School)
Church of the Nativity (Nativity School) (Menlo Park)
Church of the Nativity (San Francisco)
Corpus Christi Church
Holy Angels Church (Holy Angels School)
Holy Name of Jesus Church (Holy Name School)
Immaculate Heart of Mary Church (Immaculate Heart of Mary School)
Mater Dolorosa Church
Mission Dolores Basilica
Most Holy Redeemer Church
Most Holy Rosary Chapel
Notre Dame Des Victoires (Ecole Notre Dame des Victoires)
Old St. Mary's Church
Our Lady of Fatima Russian Byzantine Catholic
Our Lady of Guadalupe Mission (Brisbane)
Our Lady of Angels Church (Our Lady of Angels School)
Our Lady of Loretto Church (Our Lady of Loretto School)
Our Lady of Lourdes Church
Our Lady of Mercy Church (Our Lady of Mercy School)
Our Lady of Mount Carmel Church (Mill Valley)
Our Lady of Mount Carmel Church (Our Lady of Mt. Carmel School) (Redwood City)
Our Lady of Perpetual Help (Our Lady of Perpetual Help School)
Our Lady of the Pillar Church
Our Lady of Refuge Mission
Our Lady of the Visitation Church (Our Lady of the Visitation School)
Our Lady of the Wayside
Sacred Heart Church
San Jose Obero Church
Shrine of St. Francis of Assisi
St. Agnes Church
St. Andrew Church
St. Anne of the Sunset Church (St. Anne School)
St. Anselm Church (St. Anselm School)
St. Anthony Church (Menlo Park)
St. Anthony Mission (Pescadero)
St. Anthony of Padua Church (Novato)
St. Anthony of Padua Church

St. Augustine Church
St. Bartholomew Church
St. Benedict Parish
St. Boniface Church
St. Brendan Church (St. Brendan School)
St. Bruno Church
St. Catherine of Siena Church (St. Catherine of Siena School)
St. Cecilia Church (St. Cecilia School) (San Francisco)
St. Cecilia Church (Lagunitas)
St. Charles Borromeo Church
St. Charles Church (St. Charles School)
St. Denis Church
St. Dominic Church
St. Dunstan Church (St. Dunstan School)
St. Elizabeth Church
St. Emydius Church
St. Finn Barr Church (St. Finn Barr School)
St. Francis of Assisi
St. Gabriel Church (St. Gabriel School)
St. Gregory Church (St. Gregory School)
St. Helen Mission
St. Hilary Church (St. Hilary School)
St. Ignatius Church
St. Isabella Church (St. Isabella School)
St. James Church (St. James School)
St. John the Evangelist Church (St. John School)
St. John of God Chapel
St. Kevin Church
St. Luke Church
St. Mark Church
St. Mary Magdalene Mission
St. Mary Star of the Sea
St. Mary Church
St. Matthew Church (St. Matthias Preschool)
St. Matthias Church
St. Michael Korean Church
St. Monica-St. Thomas the Apostle Church (St. Monica School)
St. Patrick Church (St. Patrick School) (St. Patrick Thrift Shop) (Larkspur)
St. Patrick Church (San Francisco)
St. Paul Church (St. Paul School)
St. Paul of the Shipwreck
St. Peter Church (Pacifica)
St. Peter Church (St. Peter School) (San Francisco)
St. Philip the Apostle (St. Philip School)
St. Pius Church (St. Pius School)
St. Raphael Church (St. Raphael School)

St. Raymond Church (St. Raymond School)
St. Rita Church
St. Robert Church (St. Robert School)
St. Sebastian Church
St. Stephen Church (St. Stephen School)
St. Teresa Church
St. Thomas More Church (St. Thomas More School)
St. Timothy Church (St. Timothy School)
St. Veronica Church (St. Veronica School)
St. Vincent de Paul Church (St. Vincent de Paul School)
Star of the Sea Church (Stella Maris Academy)
Sts. Peter & Paul Church (Sts. Peter & Paul School)

The Archdiocese of San Francisco Parish and School Juridic Persons Real Property Support Corporation

Cemeteries

Holy Cross Catholic Cemeteries
Saint Mary Magdalene Catholic Cemetery
Mt. Olivet Cemetery
Our Lady of Pillar Cemetery
Tomaes Bay Cemetery

Archbishop Riordan High School

Marin Catholic High School

Junipero Serra High School

Sacred Heart Cathedral Preparatory

Vallombrosa Retreat Center

Serra Clergy House

The Archdiocese of San Francisco Parish, School and Cemetery Juridic Persons Capital Assets Support Corporation

The Roman Catholic Seminary of San Francisco

Catholic Charities CYO of the Archdiocese of San Francisco

The Benedict XVI Institute for Sacred Music and Divine Worship

EXHIBIT B

Amended Exhibit B

Catholic Charities CYO of the Archdiocese of San Francisco

1. John DB Roe SF v. Doe 1, Archdiocese; Defendant Doe 2, School; and Does 1 through 100; Case No. 22CV023360
2. John Doe H.M. v. Doe 1, a Corporation Sole; Doe 2, a religious entity form unknown; Doe 3, a religious school form unknown; and Does 4 through 500; Case No. 22CV024656
3. C.M. v. Doe 1, a corporation sole; Doe 2, a nonprofit public benefit corporation; Does 3 a religious nonprofit corporation; and Does 4 through 100; Case No. 22CV019998
4. John Doe SF 1218 v. Doe 1, a corporation sole; Doe 2, a corporation sole; Doe 3, an entity form unknown; Doe 4, an entity form unknown; Doe 5, an entity form unknown; and Doe 6 through Doe 100; Case No. 22CV021136
5. Jane Doe SF 2017 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; Doe 4 an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV024597
6. John Roe 521 v. Doe Archdiocese; Doe Parish; Case No. 22CV018853
7. John Roe 663 v. Doe Archdiocese, a California Corporation; Doe Parish, a California Nonprofit Corporation; and Does 1 through 500; Case No. 22CV023916
8. John Doe 664 v. Doe Archdiocese, a California Corporation; Doe Parish, a California Nonprofit Corporation; and Does 1 through 500; Case No. 22CV023925
9. LL John Doe WC v. Defendant Doe Archdiocese; Defendant Doe Parish; Defendant Doe Religious Order; Defendant Does 1 through 500; Case No. 22CV021767
10. John Doe SF 2028 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Doe 4 through Doe 100; Case No. 22CV024838
11. John Doe SF 1510 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, and Doe 4 through Doe 100; Case No. 22CV020445
12. John Doe v. Doe 1, a Religious Corporation Sole; Doe 2, a domestic nonprofit organization; and Does 3 through 50; Case No. 22CV010038
13. John Roe 644 v. Doe Archdiocese, a California Corporation sole; Doe Parish, a California Corporation; and Does 1 through 500; Case No. 22CV023721

14. Jane Roe v. Doe 1, a private entity; Doe 2, an individual; and Does 1 through 500; 23CV058144
15. G.J. and M.R.H. v. The Roman Catholic Archbishop of San Francisco, a domestic nonprofit corporation; Catholic Charities CYO of The Archdiocese of San Francisco, a domestic nonprofit corporation; and Does 3-20; Case No. RG20081797 (G.J., #56a)
16. G.J. and M.R.H. v. The Roman Catholic Archbishop of San Francisco, a domestic nonprofit corporation; Catholic Charities CYO of The Archdiocese of San Francisco, a domestic nonprofit corporation; and Does 3-20; Case No. RG20081797 (M.R.H., #56b)
17. John Doe SF 1426 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Doe 4 through Doe 100; Case No. 22CV020670
18. John Doe L.M. v. Doe 1 Archdiocese, a corporation sole; Doe 2 Parish, a religious entity form unknown; Doe 3 School, a religious nonprofit corporation; Doe 4 Religious Order, a religious nonprofit corporation; and Does 5-500; Case No. 22CV023773
19. John Roe 457 v. Doe Archdiocese, a corporation sole; Doe 2 Parish, a California Non-Profit Corporation; Doe Perpetrator, an individual; and Does 1 through 500; 22CV015557
20. John Doe A.D.R. v. Doe Archdiocese, a Corporation Sole; Doe Religious Order, a Religious Order, a Religious Corporation; and Doe 1 through Doe 500; Case No. 21CV004304
21. John Doe A.L.R. v. Doe Archdiocese, a Corporation Sole; Doe Religious Order; a Religious Corporation; and Doe 1 through Doe 500; Case No. 21CV004307
22. John Roe 417 v. Doe Archdiocese, a California Corporation sole; Doe Parish, a California Nonprofit Religious Corporation; and Does 1 through 500; Case No. 22CV018871
23. John Roe 499 v. The Roman Catholic Archbishop of San Francisco, a corporation sole; Catholic Charities CYO of the Archdiocese of San Francisco, a California Non-Profit Corporation; D.G., an individual; and Does 1 through 500; Case No. 23CV030277
24. G.W. v. Catholic Charities CYO of the Archdiocese of San Francisco; Does 1 through 25; Case No. CIV2101248
25. John Doe SF 1237 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV022053
26. John Doe SF 1882 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV023067

27. John Doe SF 1226 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV022050
28. John Doe SF 1894 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, Doe 5, and Doe 6 through Doe 100, inclusive; Alameda County Case No. 22CV023069
29. John Doe SF 1549 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV021924
30. John Doe SF 1166 v. Doe 1, a corporation sole, Doe 2, an entity form unknown, Doe 3, an entity form unknown, Doe 4, an entity form unknown, and Doe 5 through Doe 100, inclusive; Alameda County Case No. 22CV021961

The Roman Catholic Seminary of San Francisco aka St. Patrick's Seminary

1. Joseph Doe OAK 475 v. Doe 1, a religious corporation sole; Doe 2, a religious entity form unknown; Does 3, a religious entity form unknown; Doe 4 through Doe 100; Case No. 22CV019899
2. John Doe MR 1236 v. Doe 1, a corporation sole; Doe 2, a corporation sole; Doe 3, an entity form unknown; Doe 4, an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV022052
3. Jane Doe 7 v. Doe 1, Doe 2, Doe 3, Doe 4; Case No. RG20065264
4. John PV Roe 554 v. Doe 1 Archdiocese; Doe 2 Parish; Doe 3 Parish; Doe 4 Parish; and Does 5 through 500; Case No. 22CV024736

Sacred Heart Cathedral Preparatory

1. Joseph Doe SF 601 v. Doe 1, a religious corporation sole; Doe 2, a religious entity for unknown; Doe 3, a religious entity for unknown; Doe 4, a religious entity for unknown; and Doe 5 through Doe 100; Case No. 22CV024713.
2. Jane Doe 116 v. Does Archdiocese; Doe Parish; Doe School; Does Religious Order; Does Education Corporation; and Does 1 through 500; 22CV023807

Junipero Serra High School

1. John Doe CLG03522 v. Doe Archdiocese, a California Corporation Sole; Doe Parish, a religious entity form unknown; and DOES 1-500; Case No. 22CV024153
2. John Doe SF 1913 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Does 3 through Does 100; Case No. 22CV023455

Marin Catholic High School

1. Jane Doe SF 1260 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Does 3 through Does 100; Case No. 22CV020842
2. John Doe SF 1026 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; and Does 4 through Does 100; Case No. Case No. RG21086082
3. Jane Doe SF 2017 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; Doe 3, an entity form unknown; Doe 4 an entity form unknown; and Doe 5 through Doe 100; Case No. 22CV024597
4. John Doe SF 1196 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020664
5. Jane Doe SF 1200 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020668
6. John Doe SF 1201 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV020669
7. Jane Doe SF 1233 v. Doe 1, a corporation sole; Doe 2, an entity form unknown; and Doe 3 through Doe 100; Case No. 22CV022051

Riordan High School

1. John Doe F.O. v Doe Archdiocese, a Corporation sole; Doe Religious Order, a Business Organization Form Unknown; and Does 3 through 100; Case No. 22CV024965.

EXHIBIT C

Exhibit C

1. John SF-26 Doe, an individual, v. Doe Archdiocese, et al., Alameda County Superior Court Case No. 22CV023657
2. Jane Doe SF 1053, an individual, v. DOE 1, a Corporation Sole, et al., Alameda County Superior Court Case No. RG21107972
3. John Doe W.C.D., an individual, v. DOE 1 Archdiocese, a corporation sole, et al., Alameda County Superior Court Case No. 22CV013926
4. Jane Doe SF 1260, an individual, v. DOE 1, a corporation sole., et al., Alameda County Superior Court Case No. 22CV020842
5. John MW Roe SF, individually, v. Defendant Doe 1, Archdiocese, et al., Alameda County Superior Court Case No. 22CV018182